

Al Rajhi Bank

Ex. D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

ORAL ARGUMENT REQUESTED

This document relates to:

*The Underwriting Members of Lloyd's
Syndicate 2, et al. v. Al Rajhi Bank, et al., No.
16-cv-7853; Aguilar, et al. v. Kingdom of
Saudi Arabia, et al., No. 16-cv-09663;
Addesso, et al. v. Kingdom of Saudi Arabia, et
al., No. 16-cv-09937; Hodges, et al. v.
Kingdom of Saudi Arabia, et al., No. 17-cv-
0117; Aiken, et al. v. Kingdom of Saudi
Arabia, et al., No. 17-cv-00450; Charter Oak
Fire Insurance Co., et al. v. Al Rajhi Bank, et
al., No. 17-cv-02651; Abarca, et al., v.
Kingdom of Saudi Arabia, et al., No. 17-cv-
03887; Arrowood Indemnity Co., et al. v.
Kingdom of Saudi Arabia, et al., No. 17-cv-
03908; Abedhajajreh v. Kingdom of Saudi
Arabia, No. 17-cv-06123; Muenchener
Rueckversicherungs-Gesellschaft
Aktiengesellschaft in Muenchen, et al. v.
Kingdom of Saudi Arabia, et al., No. 17-cv-
07914; and Abbate, et al. v. Kingdom of Saudi
Arabia, et al., No. 17-cv-08617*

**AL RAJHI BANK'S CONSOLIDATED OBJECTIONS TO
EVIDENCE CITED BY PLAINTIFFS**

Pursuant to the Court's April 17, 2023 Order (ECF No. 9026): "[E]ach party may submit, attached to a separately filed attorney declaration, a chart setting forth objections to evidence proffered or cited by an opposing party in its previous filing. Each entry on the chart should state the title of the document, the MDL docket number (and, where relevant, page or paragraph numbers), and the objection (e.g., 'hearsay')." April 17, 2023 Order 4-5. The Court further

ordered that “[n]o legal argument should be included,” and the Court “will consider whether additional briefing is warranted.” *Id.* at 5. The Court’s February 26, 2024 Order (ECF No. 9596) granted the Parties’ joint proposal to use the same procedures set forth in the April 17, 2023 Order for “admissibility challenges, including as to expert testimony.”

Al Rajhi Bank, pursuant to the Court’s Orders, submits the below chart, which, for the convenience of the Court, consolidates (i) the Bank’s objections to evidence cited by Plaintiffs in their Averment, and (ii) the Bank’s new objections to the evidence cited by Plaintiffs in their Opposition and supporting papers. Specifically, in preparing this consolidated chart of evidentiary objections, Al Rajhi Bank has reincorporated the evidentiary objections the Bank previously submitted with its Renewed Motion to Dismiss (*see* Al Rajhi Bank’s Corrected Objections to Plaintiffs’ Averment Exhibits (June 6, 2024), ECF No. 9870-1 (ARB Ex. 60)) regarding the evidence cited by Plaintiffs in their Corrected Averment of Jurisdictional Facts and Evidence and/or Statement of Facts Pursuant to Rule 56.1 (May 7, 2024), ECF No. 9764. Al Rajhi Bank has updated those prior objections to reflect instances where Plaintiffs cite their prior evidence in their most recent “previous filing.” Apr. 17, 2023 Order 4.

Al Rajhi Bank objects to Plaintiffs’ evidence that:

- is hearsay to which no exception applies, under Rule 802 of the Federal Rules of Evidence;
- lacks authentication, under Rule 801 of the Federal Rules of Evidence;
- is an improper summary exhibit, under Rule 1006 of the Federal Rules of Evidence;
- includes witness testimony that is not based on personal knowledge, under Rule 602 of the Federal Rules of Evidence;
- should be excluded for unfair prejudice and confusing the issue, under Rule 403 of

the Federal Rules of Evidence; and/or

- is expert opinion offered by a purported expert who is not qualified to offer the opinion, or whose opinion does not reflect a reliable application of the methods used to the facts of the case, under Rule 702 of the Federal Rules of Evidence.

Moreover, all of Plaintiffs' evidence is irrelevant because, as exemplified by the Opposition, none of Plaintiffs' evidence makes it more probable than without the evidence that Al Rajhi Bank "expressly aimed" any "intentional, and allegedly tortious" conduct at the United States, or that Plaintiffs' injuries "arose from" any such conduct. *Fed. Ins. Co.*, 2023 WL 2430381, at *10; Fed. R. Evid. 401.

An objection that Plaintiffs' evidence contains inadmissible hearsay indicates that such evidence contains at least one level of inadmissible hearsay and that it may contain multiple levels of inadmissible hearsay.

To the extent that Al Rajhi Bank does not raise an evidentiary objection to a particular piece of evidence or a portion of any evidence, that is for purposes of its Renewed Motion to Dismiss only, and is not a concession that the evidence or portion of evidence is admissible. The Bank reserves the right to object in further briefing to any evidence or any portion of evidence that Plaintiffs cite.

AL RAJHI BANK'S CONSOLIDATED OBJECTIONS TO PLAINTIFFS' EVIDENCE

EX. NO.	ECF No.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
1	9624 10153-1 10153-2	September 27, 2023 Transcript of the Deposition of Abdullah bin Sulaiman Al Rajhi	Pls. Aver. (ECF No. 9624) ¶¶ 20, 28, 40, 41, 43, 44, 45, 47, 206, 207, 319, 324, 396, 399, 402, 405, 406, 407, 408, 409, 412, 415, 416 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 46, 49, 110, 124, 136, 142 Pls. Ex. B (ECF 10153-2) Resp. to ¶ 503, 573		
2	9624 10153-1	Pasley Exhibit 5 – Wikileaks Printout dated September 27, 2004	Pls. Aver. (ECF No. 9624) ¶¶ 24, 184, 198 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 125		Pls. Ex. 2: - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
3	9624 10153-1	May 11, 2023 Transcript of the Deposition of Al Rajhi Bank Rule 30(b)(6) Designee James Galloway	Pls. Aver. (ECF No. 9624) ¶¶ 26, 206, 212 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 28		

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4	9624 10153-1	Expert Report of Jonathan M. Winer, marked as Pasley Exhibit 3	Pls. Aver. (ECF No. 9624) ¶¶ 27, 36, 40, 46, 48, 49, 50, 51, 52, 63, 64, 65, 66, 67, 68, 70, 71, 74, 75, 107, 112, 113, 115, 116, 126, 127, 129, 138, 141, 143, 144, 146, 147, 158, 159, 161, 164, 179 (fns. 55, 59, 60), 180 (fns. 74, 78), 182, 183, 184, 185, 186, 190, 206, 207, 208, 210, 211, 212, 214, 219, 221, 224, 227, 228, 230, 231, 232, 233, 235, 238, 239, 240, 241, 242, 243, 246, 253, 257, 260, 261, 262, 263, 273, 274, 278, 279, 280, 283, 284, 285, 286, 287, 288, 289, 290, 293, 297, 298, 299, 303, 304, 306, 307, 308, 309, 314, 315, 316, 318, 319, 320, 324, 326, 327, 328, 329, 331, 332, 338, 343, 352, 366,		<p><u>Pls. Ex. 4:</u></p> <ul style="list-style-type: none"> - Expert is not qualified to offer opinion on Saudi Banking regulations or CIA intelligence gathering. <i>See</i> Fed. R. Evid. 702. - Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. - Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay (for example, Kane Aff., NL docs, Golden Chain, CIA documents). <i>See</i> Fed. R. Evid. 802. - Should be excluded as needless presentation of cumulative evidence. <i>See</i> Fed. R. Evid. 403. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues, <i>i.e.</i>, for discussing charity work and routine banking services that have no link to Al Qaeda, discussing attacks and theaters not at issue in this litigation, and for attempting to

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			368, 370, 375, 379, 380, 388, 389, 392, 394, 396, 398, 399, 400, 403, 406, 407, 408, 409, 411, 412, 413, 416, 431, 436, 465, 466, 470, 502, 525, 526, 527, 528, 534, 539, 541, 542, 544, 545, 546, 553, 562, 565, 568 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 22, 25, 26, 27, 29, 30, 31, 32, 33, 34, 43, 44, 45, 46, 47, 49, 51, 53, 56, 57, 58, 63, 70, 82, 94, 122, 127, 128, 129, 130		impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
5	9624	March 7, 2024 Declaration of Jonathan M. Winer	Pls. Aver. (ECF No. 9624) ¶ 27		
6	9624 10153-1	1998 Al Rajhi Bank Annual Report	Pls. Aver. (ECF No. 9624) ¶ 29, 33, 35 Pls. Ex. A (ECF No. 10153-1) Resp. to		

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			¶¶ 13, 102, 103, 104, 105		
7	9624 10153-1	1999 Al Rajhi Bank Annual Report	Pls. Aver. (ECF No. 9624) ¶ 29 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 13, 102, 103, 104, 105		
8	9624	2000 Al Rajhi Bank Annual Report	Pls. Aver. (ECF No. 9624) ¶¶ 29, 33, 35		
9	9624 10153-1	CIA Report, Funding Islamic Extremist Movements: The Role of Islamic Financial Institutions	Pls. Aver. (ECF No. 9624) ¶¶ 33, 40, 42, 132, 135, 153, 276, 278, 541, 543, 559, 561, 567 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 6, 7, 59, 60, 67, 94, 118, 130, 142, 143	CIA000720-804	<u>Pls. Ex. 9:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
10	9624 10153-1	CIA Report, Al Rajhi Bank: Conduit for Extremist Finance	Pls. Aver. (ECF No. 9624) ¶¶ 34, 137, 178, 182, 189, 190 Pls. Ex. A (ECF No. 10153-1) Resp. to	CIA- SUB_0001-6	<u>Pls. Ex. 10:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).

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			¶¶ 1, 4, 5, 6, 7, 47, 59, 60, 94, 118, 130, 142, 143		
11	9624 10153-1	CIA Report, Islamic Banking: A Potential Economic Enabler in the Muslim World	Pls. Aver. (ECF No. 9624) ¶¶ 34, 137, 185 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 7, 118	CIA- SUB_0020-30	<u>Pls. Ex. 11:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
12	9624 10153-1	January 12, 2024 Transcript of the Deposition of Jonathan M. Winer	Pls. Aver. (ECF No. 9624) ¶¶ 39, 142 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 6, 7, 20, 21, 23, 47, 59, 61, 67, 68, 73, 74, 79, 80, 85, 86, 110, 118		<u>Pls. Ex. 12:</u> - Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay (<i>see</i> Fed. R. Evid. 802) and to the extent expert is not qualified to offer opinion (<i>see</i> Fed. R. Evid. 702).
13	9624	Abdullah al Rajhi Exhibit 50 – Sulaiman bin Abdulaziz Al Rajhi Charity Foundation Webpage	Pls. Aver. (ECF No. 9624) ¶¶ 40, 41		<u>Pls. Ex. 13:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
14	9624	Abdullah al Rajhi Exhibit 56 – Unsigned Draft Document	Pls. Aver. (ECF No. 9624) ¶¶ 41, 43, 52, 406, 407, 408, 409, 410, 411, 412	NL 9625	<u>Pls. Ex. 14:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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					- Lacks authentication. <i>See</i> Fed. R. Evid. 901.
15	9624	August 24, 1999 letter from "Abdullah bin Ibrahim Al-Misfer" to the Executive Director of "Islamic Call at Universities," in Garden Grove, California	Pls. Aver. (ECF No. 9624) ¶¶ 43, 113	NL 9623	<u>Pls. Ex. 15:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
16	9624 10153-1	October 14, 2001 letter from Foundation "General Supervisor" "Abdel Rahman bin Abdullah Al Rajhi" to WAMY Secretary General "Manei bin Hammad Al Juhani"	Pls. Aver. (ECF No. 9624) ¶ 43 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 68	WAMYSA 102829	<u>Pls. Ex. 16:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
17	9624 10153-1	June 17, 2002 letter from "Abdul Rahman bin Abdullah Alrajhi" to	Pls. Aver. (ECF No. 9624) ¶ 43	WAMYSA 502115	<u>Pls. Ex. 17:</u>

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		WAMY Secretary General "Manei bin Hammad Al Juhani"	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 68		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
18	9624	Abdullah al Rajhi Exhibit 63 – May 30, 1995 letter from the Assistant Director of IIRO-Tanzania to the Chief of Protocol, Ministry of Foreign Affairs, Dar es Salaam	Pls. Aver. (ECF No. 9624) ¶ 44	IIRO 315040	<u>Pls. Ex. 18:</u> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
19	9624	SAAR Foundation Articles of Incorporation	Pls. Aver. (ECF No. 9624) ¶ 45	PEC-BARZ 13145-13160	<u>Pls. Ex. 19:</u> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.

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20	9624	SAAR Foundation State Corporation Annual Report	Pls. Aver. (ECF No. 9624) ¶ 45	PEC-BARZ 11521	Pls. Ex. 20: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
21	9624	1987 SAAR Foundation Form 990	Pls. Aver. (ECF No. 9624) ¶ 45	NL 693-713	Pls. Ex. 21: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. -Lacks authentication. <i>See</i> Fed. R. Evid. 901.
22	9624	SAAR Foundation Annual Reports 1996-2000	Pls. Aver. (ECF No. 9624) ¶ 45	PEC-BARZ 13117-13127	Pls. Ex. 22: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
23	9624	2000 SAAR Foundation Form 990	Pls. Aver. (ECF No. 9624) ¶ 45	PEC-BARZ 12025-12041	Pls. Ex. 23: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
24	9624	Sana-Bell Articles of Incorporation	Pls. Aver. (ECF No. 9624) ¶¶ 46, 395, 554	SANA-BELL 0000110	Pls. Ex. 24: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 902.

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					- Lacks authentication. <i>See</i> Fed. R. Evid. 901.
25	9624	SAAR Annual Reports – Abdullah al Rajhi Exhibit 57	Pls. Aver. (ECF No. 9624) ¶¶ 47, 396		<u>Pls. Ex. 25:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
26	9624 10153-1	Lormel Exhibit 9 – Joint FBI-CIA Intelligence Report, “Assessment of Saudi Arabian Support to Terrorism and the Counterintelligence Threat to the United States”	Pls. Aver. (ECF No. 9624) ¶¶ 48, 71, 110, 119, 393, 398, 474 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 55, 62, 71, 136	EO 14040 3414-3442	<u>Pls. Ex. 26:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
27	9624	Kane Affidavit	Pls. Aver. (ECF No. 9624) ¶¶ 49, 394, 398, 400, 401	FED-PEC 1243-1369	<u>Pls. Ex. 27:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
28	9624	John Mintz & Tom Jackman, “Finances Prompted Raids on Muslims,” The	Pls. Aver. (ECF No. 9624) ¶ 49		<u>Pls. Ex. 28:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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		Washington Post, March 23, 2002			
29	9624 10153-1	Galloway Exhibit 22 – October 18, 1999 letter from “Sulaiman A. Al-Saleh” to [REDACTED]	Pls. Aver. (ECF No. 9624) ¶¶ 50, 249, 405, 408, 409, 412, 415, 416, 418, 419, 420, 421, 422, 424, 426, 473, 552, 560 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 6, 53, 67, 73, 130, 136	NL 15578, 15043-15046	<u>Pls. Ex. 29:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lack authentication. <i>See</i> Fed. R. Evid. 901.
30	9624	October 26, 1999 email from [REDACTED] to “Abdullah Sulaiman Al Rajhi” (“Abu Sultan”)	Pls. Aver. (ECF No. 9624) ¶ 51	NL 20470	<u>Pls. Ex. 30:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
31	9624	November 3, 1999 email from “Bsurha” to [REDACTED]	Pls. Aver. (ECF No. 9624) ¶ 51	NL 20452	<u>Pls. Ex. 31:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
32	9624	November 3-4, 1999 email exchanges between	Pls. Aver. (ECF No. 9624) ¶ 51	NL 20453	<u>Pls. Ex. 32:</u>

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		"[REDACTED]" and "Bushra Ahmed"			- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
33	9624	November 22, 1999 email from "[REDACTED]" to "Abdullah S. Al-Rajhi"	Pls. Aver. (ECF No. 9624) ¶ 51	NL 15048	<u>Pls. Ex. 33:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
34	9624	June 22, 2000 email from "[REDACTED]" to "Abdullah S. Al-Rajhi"	Pls. Aver. (ECF No. 9624) ¶¶ 51, 414	NL 15551	<u>Pls. Ex. 34:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
35	9624	October 31, 2000 email from "[REDACTED]" to "Abdullah S. Al Rajhi"	Pls. Aver. (ECF No. 9624) ¶¶ 51, 414	NL 15572	<u>Pls. Ex. 35:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
36	9624	November 9, 2000 fax from "[REDACTED]" to "Abdullah S. Al-Rajhi" ("Abu Sultan")	Pls. Aver. (ECF No. 9624) ¶¶ 51, 414	NL 15573-15576	<u>Pls. Ex. 36:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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					- Lacks authentication. <i>See</i> Fed. R. Evid. 901.
37	9624	February 14, 2001 email from [REDACTED] to "Abdullah Sulaiman al Rajhi"	Pls. Aver. (ECF No. 9624) ¶¶ 51, 414	NL 15042	<u>Pls. Ex. 37:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
38	9624 10153-1	Expert Report of Evan F. Kohlmann, marked as Pasley Exhibit 4	Pls. Aver. (ECF No. 9624) ¶¶ 53, 55, 61, 64, 65, 66, 68, 71, 73, 74, 112, 113, 115, 116, 122, 124, 132, 143, 159, 161, 210, 216, 217, 226, 235, 238, 240, 242, 245, 246, 290, 421, 423, 502, 539, 546, 553, 560, 562, 567, 568, 574 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 56, 59, 60, 67, 68, 70, 71, 73, 82, 130		<u>Pls. Ex. 38:</u> - Expert is not qualified to offer opinion on Saudi Banking regulations, Saudi Culture, Islamic Charities, or designations. <i>See</i> Fed. R. Evid. 702. - Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. - Should be excluded to the extent expert testimony is used as a conduit for hearsay to which no exception applies (<i>e.g.</i> , Kane Aff., NL docs, Golden Chain). <i>See</i> Fed. R. Evid. 802.

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					<p>- Should be excluded as needless presentation of cumulative evidence. <i>See</i> Fed. R. Evid. 403.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity work and routine banking services that have no link to Al Qaeda, discussing attacks and theaters not at issue in this litigation, and for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.</p>
39	9624	Declaration of Evan F. Kohlmann, Mar. 6, 2024	Pls. Aver. (ECF No. 9624) ¶ 53		
40	9624 10153-1 10153-2	Lormel Exhibit 15 – 9/11 Commission Final Report	<p>Pls. Aver. (ECF No. 9624) ¶¶ 53, 54, 56, 58, 59, 60, 61, 65, 66, 67, 139, 140, 158, 224, 438, 461</p> <p>Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 96</p> <p>Pls. Ex. B (ECF No. 10153-2) Resp. to ¶¶ 265, 459</p>		

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41	9624	Arnaout Evidentiary Proffer – Dean Exhibit 4	Pls. Aver. (ECF No. 9624) ¶¶ 59, 122		<u>Pls. Ex. 41:</u> -Hearsay to which no exception applies. Fed. R. Evid. - Lack of personal knowledge. <i>See</i> Fed. R. Evid. 602. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing conduct that is not sufficiently similar to the conduct at issue and not related to the attacks at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
42	9624 10153-1	Notes of Interview with Unidentified “Source”	Pls. Aver. (ECF No. 9624) ¶¶ 59, 68, 126 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 1	PEC-KSA000329-352	<u>Pls. Ex. 42:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Lack of personal knowledge. <i>See</i> Fed. R. Evid. 602.
43	9624	Dean Exhibit 5 – Islamic International Brigade (IIB), U.N. Designation	Pls. Aver. (ECF No. 9624) ¶ 59		<u>Pls. Ex. 43:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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					<p>- Lacks authentication. <i>See</i> Fed. R. Evid. 901.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and organizations that are not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
44	9624 10153-1	Staff Monograph on Terrorist Financing – Lormel Exhibit 12	<p>Pls. Aver. (ECF No. 9624) ¶¶ 63, 64, 70, 74, 201</p> <p>Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 20, 21, 23</p>		
45	9624 10153-1	CIA Report, Saudi-Based Financial Support for Terrorist Organizations	<p>Pls. Aver. (ECF No. 9624) ¶¶ 64, 66, 104, 123, 127, 129, 135, 174, 221, 246, 540</p> <p>Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 44, 56, 71, 94, 130</p>	CIA 143-158	<p><u>Pls. Ex. 45:</u></p> <p>- Inadmissible hearsay, as noted in Resp. to Pls. Aver. Section VI (heading).</p>
46	9624 10153-1	CIA Report, Identifying Al-Qa'ida's Donors and Fundraisers: A Status Report	Pls. Aver. (ECF No. 9624) ¶¶ 64, 135, 165, 539, 547	CIA 193-199	<p><u>Pls. Ex. 46:</u></p> <p>- Inadmissible hearsay, as noted in Resp. to Pls. Aver. Section VI (heading).</p>

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			Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 7, 59, 118, 143		
47	9624	CIA Report, Spectrum of Al-Qa'ida's Donors	Pls. Aver. (ECF No. 9624) ¶ 64	CIA 659-667	<u>Pls. Ex. 47:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. Section VI (heading).
48	9624	AHIF Designation – Lormel Exhibit 18	Pls. Aver. (ECF No. 9624) ¶¶ 71, 73, 75, 205, 235		
49	9624	September 6, 2002 Wa'el Jelaidan Designation	Pls. Aver. (ECF No. 9624) ¶¶ 71, 122, 124, 226		
50	9624	September 9, 2004 Al Haramain Islamic Foundation branch Designation	Pls. Aver. (ECF No. 9624) ¶¶ 71, 73, 112, 238, 484		
51	9624 10153-1	FBI Report, Connections to the Attacks of Sept. 11, 2001	Pls. Aver. (ECF No. 9624) ¶¶ 72, 106, 474, 477, 480 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 115	EO14040 3478-3608 Updated	<u>Pls. Ex. 51:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for

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					attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
52	9624 10153-1	Treasury Memorandum – <i>Al-Haramayn Islamic Foundation Bosnia-Herzegovina</i>	Pls. Aver. (ECF No. 9624) ¶¶ 72, 77 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 48	TREASURY00009-11	<u>Pls. Ex. 52:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
53	9624 10153-1	Treasury Memorandum – <i>Al-Haramain Islamic Foundation, Somalia</i>	Pls. Aver. (ECF No. 9624) ¶¶ 72, 85 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 48	TREASURY00030-36	<u>Pls. Ex. 53:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing

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					attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
54	9624	CIA Report, How Bin Laden Commands a Global Terrorist Network	Pls. Aver. (ECF No. 9624) ¶¶ 72, 94	CIA 2-16	Pls. Ex. 54: - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
55	9624 10153-1	CIA Report, Islamic Terrorists: Using Nongovernmental Organizations Extensively	Pls. Aver. (ECF No. 9624) ¶¶ 72, 95, 135, 151 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 6, 59, 60, 77, 130, 142	CIA 210-236	Pls. Ex. 55: - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
56	9624 10153-1	March 11, 2002 AHIF branch Designation	Pls. Aver. (ECF No. 9624) ¶ 73 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 48		
57	9624 10153-1	January 22, 2004 AHIF branch Designation	Pls. Aver. (ECF No. 9624) ¶ 73		

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			Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 53		
58	9624	SAMA Guidelines for Prevention of Money Laundering – Pasley Exhibit 8	Pls. Aver. (ECF No. 9624) ¶¶ 281, 284, 297, 298, 299, 300, 301, 356, 370, 376, 379, 380, 385		
59	9624	Abdullah al Rajhi Exhibit 33	Pls. Aver. (ECF No. 9624) ¶ 319 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 46.	ARB 39945-39946	
60	9624	Abdullah al Rajhi Exhibit 27 – Treasury Designates Al Haramain Islamic Foundation	Pls. Aver. (ECF No. 9624) ¶ 73		Pls. Ex. 60: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues in its description of charities and charity branches allegedly engaged in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
61	9624	Treasury Memorandum – <i>Designation of Al-</i>	Pls. Aver. (ECF No. 9624) ¶ 79	TREASURY00012-16	Pls. Ex. 61: - Hearsay to which no exception applies given heavy redactions,

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		<i>Haramain Foundation-Pakistan</i>			lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
62	9624 10153-1	Treasury Memorandum – <i>Designation of Al-Haramain Foundation (AHF) branches in Afghanistan, Albania, Bangladesh, Ethiopia, and The Netherlands, and the AHF's leader Al-Aqil pursuant to the authorities of E.O. 13224</i>	Pls. Aver. (ECF No. 9624) ¶¶ 82, 108, 111, 235, 239 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 43	TREASURY00017-29	<u>Pls. Ex. 62:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.

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63	9624	Treasury Memorandum – <i>Designation of Al-Haramain Foundation (AHF) locations in the United States, the Comoros Islands, and AHF official Soliman Al-Buthe pursuant to the authorities of E.O. 13224</i>	Pls. Aver. (ECF No. 9624) ¶¶ 86, 110	TREASURY00037-54	<p><u>Pls. Ex. 63:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
64	9624	Treasury Memorandum – <i>Additional Designations Pursuant to E.O. 13224: Al-Haramain, Indonesia</i>	Pls. Aver. (ECF No. 9624) ¶ 87	TREASURY00087-92	<p><u>Pls. Ex. 64:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly

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					engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
65	9624	Treasury Memorandum – <i>Additional Designations Pursuant to E.O. 13224: Al-Haramayn Kenya and Tanzania</i>	Pls. Aver. (ECF No. 9624) ¶ 88	TREASURY00094-101	<p><u>Pls. Ex. 65:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
66	9624 10153-1	CIA Report, Usama Bin Ladin: Some Saudi Financial Ties Probably Intact	<p>Pls. Aver. (ECF No. 9624) ¶¶ 92, 116, 125, 132, 135, 146, 147, 294, 487</p> <p>Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 6, 7, 67, 71, 77, 118, 130, 142</p>	CIA 807-848	<p><u>Pls. Ex. 66:</u></p> <ul style="list-style-type: none"> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).

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67	9624 10153-1	CIA Report, Al Haramain, in Africa: Supporting Al- Ittihad Al-Islami and Other Terrorists	Pls. Aver. (ECF No. 9624) ¶¶ 96, 109 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 44	CIA 675-679	<u>Pls. Ex. 67:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
68	9624 10153-1	CIA Report, Al-Qa'ida Still Well Positioned To Recruit Terrorists	Pls. Aver. (ECF No. 9624) ¶¶ 99, 132 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 44, 67, 71	CIA 178-189	<u>Pls. Ex. 68:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
69	9624 10153-1	CIA Report, Al Haramain: Support for Extremists and Terrorists	Pls. Aver. (ECF No. 9624) ¶¶ 100, 109, 137, 169, 339 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 43, 49	CIA-SUB_0007-19	<u>Pls. Ex. 69:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
70	9624 10153-1	The KSA and Counterterrorism – Dean Exhibit 7	Pls. Aver. (ECF No. 9624) ¶ 107 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 48		<u>Pls. Ex. 70:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues in its description of charities and charity branches allegedly engaged in

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					extremism with no mention of Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
71	9624	Affidavit in Support of Search Warrant, USDC for the District of Oregon, Case 6:05-cr-60008-AA	Pls. Aver. (ECF No. 9624) ¶ 110		<u>Pls. Ex. 71:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for its description of charities and charity branches allegedly engaged in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
72	9624	David Crawford, "How a Diplomat From Saudi Arabia Spread His Faith," WSJ, September 10, 2003	Pls. Aver. (ECF No. 9624) ¶¶ 112, 426		<u>Pls. Ex. 72:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
73	9624	Al Jazirah, The Al Haramain Islamic Foundation Launches a Donation Campaign for the Palestinians, April 8, 2002; Al Minbar, Achievements of the Al-Haramain Islamic Foundation's in Palestine	Pls. Aver. (ECF No. 9624) ¶ 113		<u>Pls. Ex. 73:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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74	9624	Wikileaks Printout dated February 13, 2007	Pls. Aver. (ECF No. 9624) ¶ 115		<u>Pls. Ex. 74:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
75	9624 10153-1	Treasury Memorandum – <i>Additional Designations Pursuant to E.O. 13224: Dr. Abd Al Hamid Sulaiman Al-Mujil and International Islamic Relief Organization Philippines and Indonesia Branches</i>	Pls. Aver. (ECF No. 9624) ¶ 115, 117, 118, 240, 242, 246 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 60	TREASURY00102-121	<u>Pls. Ex. 75:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
76	9624	Purported United States Department of State Cable printout dated June 2004	Pls. Aver. (ECF No. 9624) ¶ 116	PEC-KSA 1464-1466	<u>Pls. Ex. 76:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues in its

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					description of charities and charity branches allegedly engaged in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
77	9624	1996 Central Intelligence Agency Report	Pls. Aver. (ECF No. 9624) ¶¶ 116, 127	PEC-KSA000965-978	<p><u>Pls. Ex. 77:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Inadmissible hearsay, as noted in Resp. to Pls. Aver. Section VI (heading). - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice for describing charities and charity branches allegedly engaged in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
78	9624 10153-1	February 21, 2019 Transcript of the Deposition of Adnan Basha	<p>Pls. Aver. (ECF No. 9624) ¶¶ 120, 216, 217, 317</p> <p>Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 55, 62</p>		<p><u>Pls. Ex. 78:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lack of personal knowledge. <i>See</i> Fed. R. Evid. 602. - Should be excluded under Rule 403 for unfair prejudice for

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					discussing charity work and routine banking services that have no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
79	9624 10153-1	Treasury Memorandum – <i>Additional Designation Pursuant to E.O. 13224</i>	Pls. Aver. (ECF No. 9624) ¶ 124 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 60	TREASURY00001-8	<u>Pls. Ex. 79:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
80	9624 10153-1	CIA Report, Usama Bin Ladin: Al-Qa'ida's Financial Facilitators	Pls. Aver. (ECF No. 9624) ¶¶ 125, 226 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 77	CIA 500-563	<u>Pls. Ex. 80:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. Section VI (heading).
81	9624	Purported Golden Chain	Pls. Aver. (ECF No. 9624) ¶¶ 126, 131, 226	FED-PEC 134953-134955	<u>Pls. Ex. 81:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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82	9624	Treasury Memorandum – <i>Designation Pursuant to E.O. 13224 of Yasin Al-Qadi</i>	Pls. Aver. (ECF No. 9624) ¶¶ 127, 128, 425	TREASURY00055-86	<p><u>Pls. Ex. 82:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theatres not at issue in this litigation and for descriptions of charity branches allegedly engaging in extremism with no connection to Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
83	9624	David Aufhauser Letter, dated November 29, 2001	Pls. Aver. (ECF No. 9624) ¶ 127		<p><u>Pls. Ex. 83:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
84	9624	June 2, 2004 Co-operating Witness Interview with unidentified source	Pls. Aver. (ECF No. 9624) ¶¶ 128, 487		<p><u>Pls. Ex. 84:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for confusing the issue and unfair prejudice for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.

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85	9624	December 21, 2004 U. S. Department of Treasury Adel Batterjee Designation	Pls. Aver. (ECF No. 9624) ¶¶ 130, 221		
86	9624	Federal Register, Volume 86, No. 172, September 9, 2021, Executive Order 14040	Pls. Aver. (ECF No. 9624) ¶ 133		
87	9624	March 29, 2022 email from Sarah Normand	Pls. Aver. (ECF No. 9624) ¶ 134		
88	9624	April 1, 2022 Index of Documents Produced Pursuant to Section 2(b)(i) of E.O. 14040	Pls. Aver. (ECF No. 9624) ¶ 134		<u>Pls. Ex. 88:</u> - Improper summary exhibit. <i>See</i> Fed. R. Evid. 1006.
89	9624 10153-1	CIA Report, Al-Qa'ida in Sudan, 199-96: Old School Ties Lead Down Dangerous Paths	Pls. Aver. (ECF No. 9624) ¶¶ 135, 177 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 7, 118	CIA 38-52	<u>Pls. Ex. 89:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
90	9624	CIA Report, Terrorism Finance: Custodial Interviews Providing Leads Into Al-Qa'ida Financial Network—Winer Exhibit 2	Pls. Aver. (ECF No. 9624) ¶ 135	CIA 306-315	<u>Pls. Ex. 90:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).

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91	9624 10153-1	CIA Report, Usama Bin Ladin's Finances: Some Estimates of Wealth, Income, and Expenditures	Pls. Aver. (ECF No. 9624) ¶¶ 135, 144 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 1, 6, 130, 142	CIA 317-338	<u>Pls. Ex. 91:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
92	9624	June 7, 2022 email from Sarah Normand	Pls. Aver. (ECF No. 9624) ¶ 137		
93	9624	CIA Report, Talbah: Linking Extremists in the Balkans and the United States	Pls. Aver. (ECF No. 9624) ¶¶ 137, 423	CIA-SUB 0031-33	<u>Pls. Ex. 93:</u> - Inadmissible hearsay, as noted in Resp. to Pls. Aver. § VI (heading).
94	9624	Glenn Simpson, "U.S. Tracks Saudi Bank Favored by Extremists," WSJ, July 26, 2007	Pls. Aver. (ECF No. 9624) ¶ 180 fn. 73		<u>Pls. Ex. 94:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
95	9624	Pasley Exhibit 6 – Wikileaks Printout dated November 25, 2004	Pls. Aver. (ECF No. 9624) ¶¶ 184, 199, 200		<u>Pls. Ex. 95:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
96	9624 10153-1	Terrorism Financing – Origination, Organization, and Prevention, R. Richard Newcomb, July 31, 2003	Pls. Aver. (ECF No. 9624) ¶¶ 192 Pls. Ex. A (ECF No. 10153-1) Resp. to		<u>Pls. Ex. 96:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
			¶¶ 5, 50, 60, 61, 68, 74, 80, 86		
97	9624	Makhtab al Khidamat Designation – U.N. Security Council	Pls. Aver. (ECF No. 9624) ¶ 158		
98	9624 10153-1	Al Haramain 94 Accounts – Abdullah al Rajhi Exhibit 31	Pls. Aver. (ECF No. 9624) ¶¶ 206, 207 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 49, 110, 124		<u>Pls. Ex. 98:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Improper summary exhibit. <i>See</i> Fed. R. Evid. 1006.
99	9624 10153-1	Lormel Exhibit 20 – Undated Al-Haramain letter listing 15 of its accounts	Pls. Aver. (ECF No. 9624) ¶¶ 210, 211, 314, 315 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 43	ARB 38816	
100	9624	September 26, 1994 Letter from Al-Haramain concerning Accounts	Pls. Aver. (ECF No. 9624) ¶¶ 210, 313	ARB 38534-38535	
101	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Sept. 26, 1998	Pls. Aver. (ECF No. 9624) ¶¶ 210, 328, 332	ARB 39000, 38999, 38998	

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
102	9624	Abdullah al Rajhi Exhibit 32 – Chart of 287 IIRO accounts at ARB	Pls. Aver. (ECF No. 9624) ¶ 213		Pls. Ex. 102: - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Improper summary exhibit. <i>See</i> Fed. R. Evid. 1006.
103	9624	April 1, 2019 Declaration of Omar Mohammedi (03 MD 1570, ECF No. 4465)	Pls. Aver. (ECF No. 9624) ¶ 219		Pls. Ex. 103: - Inadmissible hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
104	9624	Exhibit 19 to the April 1, 2019 Declaration of Omar Mohammedi (03 MD 1570, ECF No. 4465-19)	Pls. Aver. (ECF No. 9624) ¶ 219		Pls. Ex. 104: - Inadmissible hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
105	9624	Letter from WAMY re: accounts at ARB	Pls. Aver. (ECF No. 9624) ¶ 219	WAMYSA 15516	Pls. Ex. 105:

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					<ul style="list-style-type: none"> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
106	9624	April 1, 2019 Declaration of Ibrahim Alshalan (03 MD 1570, ECF No. 4466)	Pls. Aver. (ECF No. 9624) ¶ 220		<p><u>Pls. Ex. 106:</u></p> <ul style="list-style-type: none"> - Inadmissible hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
107	9624	Meeting Notes of Self-Supervisory Committee	Pls. Aver. (ECF No. 9624) ¶ 221	ARB 39582-39585	
108	9624	Benevolence International Foundation (BIF) Designation	Pls. Aver. (ECF No. 9624) ¶ 221		
109	9624	Wael Hamzah Jelaidan Account Statement	Pls. Aver. (ECF No. 9624) ¶¶ 224, 225	ARB 974-1019	

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110	9624	Wael Hamzah Jelaidan KYC files	Pls. Aver. (ECF No. 9624) ¶ 224	ARB 1183-1216	
111	9624	Wael Hamzah Jelaidan KYC files	Pls. Aver. (ECF No. 9624) ¶ 224	ARB 1217-1226	
112	9624	Account Statements Requested by SAMA	Pls. Aver. (ECF No. 9624) ¶ 224	ARB 14464-14466	
113	9624 10153-2	Federal Office of Criminal Investigation, Report Concerning the Third World Relief Agency ("TWRA")	Pls. Aver. (ECF No. 9624) ¶¶ 224, 438, 462 Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 459		Pls. Ex. 113: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issue for presenting evidence of conduct that is not sufficiently similar to the conduct at issue and discussing transactions outside the relevant period. <i>See</i> Fed. R. Evid. 403.
114	9624	Aqil al Aqil Account Statements	Pls. Aver. (ECF No. 9624) ¶¶ 227, 228, 230, 335, 336, 347, 348, 353	ARB 41454-41463	
115	9624	Aqil al Aqil Account Statements	Pls. Aver. (ECF No. 9624) ¶¶ 227, 228, 253, 260, 261	ARB 41464-41501	

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116	9624	Aqil al Aqil Account Statements	Pls. Aver. (ECF No. 9624) ¶ 227	ARB 41502-41503	
117	9624	Aqil al Aqil Account Statements	Pls. Aver. (ECF No. 9624) ¶ 227	ARB 41506-41507	
118	9624	Plaintiffs' Characterization of IIRO Accounts.	Pls. Aver. (ECF No. 9624) ¶¶ 227, 229, 231, 239, 253		Pls. Ex. 118: - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Improper summary exhibit. <i>See</i> Fed. R. Evid. 1006.
119	9624	Al Mujil Account Statements	Pls. Aver. (ECF No. 9624) ¶¶ 241, 342	ARB 745-787	
120	9624	Al Mujil Account Statements	Pls. Aver. (ECF No. 9624) ¶ 241	ARB 788-810	
121	9624 10153-1	Khalifa ARB Account	Pls. Aver. (ECF No. 9624) ¶¶ 243, 244 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 136	ARB 1098-1105	
122	9624 10153-1	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 6, 53, 105	ARB 38079-38107 and ARB 39948-39959	

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123	9624	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249	ARB 39960	
124	9624	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249	ARB 39961	
125	9624 10153-1	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 105	ARB 42183-42184	
126	9624 10153-1	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 5, 105	ARB 42179-42180	
127	9624 10153-1	Suleiman al Rajhi Charity Foundation Account Transfers to AHIF	Pls. Aver. (ECF No. 9624) ¶ 249 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 5	ARB 42181-42182	
128	9624 10153-1	Purported Checks payable to AHIF	Pls. Aver. (ECF No. 9624) ¶¶ 250, 418 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 6, 47, 49, 53	NL 10086, 10088, 10094, 10245	<u>Pls. Ex. 128:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.

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					- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
129	9624	"Abdel Rahman Abdullah al Rajhi's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶¶ 253, 256, 258, 572	ARB 40860-41153	
130	9624	"Abdel Rahman Abdullah al Rajhi" and "Saleh al Habdan's" Joint Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 41176-41184	
131	9624	"Abdel Rahman Abdullah al Rajhi's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 41185-41278	
132	9624	"Abdel Rahman Abdullah al Rajhi" and "Saleh al Habdan's" Joint Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 42185-42186	
133	9624	"Abdel Rahman Abdullah al Rajhi's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 42187-42188	
134	9624	"Saleh al Habdan's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶¶ 253, 569	ARB 41668-41720	
135	9624	"Abdullah al Ibrahim al Misfer's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 41441-41442	

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136	9624	"Abdullah al Ibrahim al Misfer" and "Abdel Rahman al Aqil's" Al Rajhi Bank Account Statement	Pls. Aver. (ECF No. 9624) ¶ 253	ARB 41279-41283	
137	9624	FDIC Guidelines, March 30, 1995	Pls. Aver. (ECF No. 9624) ¶ 433		
138	9624 10153-1	ARB transactions using ARB's PTA with Chase Manhattan Bank in February and March of 2005	Pls. Aver. (ECF No. 9624) ¶ 439 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 27, 122	JMPC 001-228	
139	9624 10153-1	Internal IIRO correspondence regarding funds, Aug. 25, 2001	Pls. Aver. (ECF No. 9624) ¶¶ 453, 486 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 65, 109, 115	IIRO 109118-109119	<u>Pls. Ex. 139:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
140	9624	Purported Exhibits from Unidentified Proceedings	Pls. Aver. (ECF No. 9624) ¶¶ 400, 401		<u>Pls. Ex. 140:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issue for discussing

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
					routine banking services and attempting to impute guilt-by-association. <i>See</i> Fed. R. Evid. 403.
141	9624 10153-1	Purported Payments from "Abdul Rahman Bin Abdullah AlRajhi"	Pls. Aver. (ECF No. 9624) ¶¶ 467, 469, 480 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 115	NL 10447, 10455, 10456, 10457, 10458, 10460, 10462, 10463, 10464, 10466, 10467, 10470, 10471, 10472, 10473, 10474, 10475, 10483, 10485, 10491	<u>Pls. Ex. 141:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
142	9624	\$5,000.00 check, dated July 7, 1999, payable to "Khaled Bin Ibrahim A-Swailem"	Pls. Aver. (ECF No. 9624) ¶ 472	NL 10485	<u>Pls. Ex. 142:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
143	9624	\$726.67 check, dated December 11, 1998, payable to "Khaled I. Al-Sowailem"	Pls. Aver. (ECF No. 9624) ¶ 473	KSA 1685	<u>Pls. Ex. 143:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
144	9624	\$398.14 check, dated December 14, 1998, payable to "Khaled I. Al-Sowailem"	Pls. Aver. (ECF No. 9624) ¶ 473	KSA 1687	<u>Pls. Ex. 144:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
145	9624	October 31, 2000 email from '██████████'	Pls. Aver. (ECF No. 9624) ¶¶ 408, 409, 412, 473	NL 15572	<u>Pls. Ex. 145:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.

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					- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
146	9624	"Outward Payment Order" of \$25,000.00 to the "Royal Embassy of Saudi Arabia IFTA #5"	Pls. Aver. (ECF No. 9624) ¶ 473	NL 10468	<u>Pls. Ex. 146:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 802. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
147	9624	2012 FBI Summary Report (03 MD 1570, ECF No. 6292-1)	Pls. Aver. (ECF No. 9624) ¶ 475		<u>Pls. Ex. 147:</u> - Hearsay to which no exception applies given heavy redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802.
148	9624 10153-1	Buthe Transactions totaling \$45,000	Pls. Aver. (ECF No. 9624) ¶¶ 482, 285 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 53, 115	ARB 39154, 39156, 39158, 39160, 39162, 39164	
149	9624	Transcript of the August 22, 2007 Proceedings in the matter of <i>USA v. Pirouz Sedaghtay</i> , Case 6:05-cr-60008-AA	Pls. Aver. (ECF No. 9624) ¶ 485		<u>Pls. Ex. 149:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for confusing the issue and unfair prejudice to the extent Plaintiffs attempt to impute liability

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					through connections with individuals. <i>See</i> Fed. R. Evid. 403.
150	9624 10153-1	ARB account statement for Islamic Relief Organization-Health, identifying an August 19, 2001 transaction, 125,500.00 SR debit, "Issuance of bank checks."	Pls. Aver. (ECF No. 9624) ¶ 486 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 65, 109, 115	ARB 2477-2572	
151	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, Nov. 1, 1994	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 215526-215529	<u>Pls. Ex. 151:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
152	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 126173-126176	<u>Pls. Ex. 152:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
153	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, Oct. 16, 2001	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 112761-112762	<u>Pls. Ex. 153:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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					- Lacks authentication. <i>See</i> Fed. R. Evid. 901.
154	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, June 4, 2001	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 112745-112748	Pls. Ex. 154: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
155	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, Apr. 6, 2003	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 59410-59411	Pls. Ex. 155: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
156	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, Mar. 31, 2003	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 108937	Pls. Ex. 156: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
157	9624	IIRO Correspondence re Fatma Al-Zahraa Hospital, July 10, 2003	Pls. Aver. (ECF No. 9624) ¶ 487	IIRO 105986	Pls. Ex. 157: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.

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158	9624	IIRO 1999-2000 Annual Report, marked as Basha Exhibit 134	Pls. Aver. (ECF No. 9624) ¶ 487		Pls. Ex. 158: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
159	9624 10153-1	February 8, 2024 Transcript of the Deposition of Aimen Dean	Pls. Aver. (ECF No. 9624) ¶ 488 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 65, 109, 115		
160	9624	FBI Memorandum, Sept. 27, 2001	Pls. Aver. (ECF No. 9624) ¶¶ 490, 497, 500	EO 14040-0028572863	Pls. Ex. 160: - Hearsay to which no exception applies given redactions, lack of sourcing, and hearsay within hearsay. <i>See</i> Fed. R. Evid. 802.
161	9624	August 6, 2000 letter re: Towayan's leave of absence	Pls. Aver. (ECF No. 9624) ¶ 491	ARB 40369	
162	9624	Towayan Transactions, 1998-2002	Pls. Aver. (ECF No. 9624) ¶¶ 494, 496	ARB 42189-42216	
163	9624	Towayan Transactions, Dec. 31, 2002	Pls. Aver. (ECF No. 9624) ¶¶ 495, 499	ARB 42217-42218	
164	9624	Susan Schmidt, October 2, 2003	Pls. Aver. (ECF No. 9624) ¶ 503		Pls. Ex. 164:

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
					<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice. <i>See</i> Fed. R. Evid. 403.
165	9624	October 21, 2019 Transcript of the Deposition of Ibrahim Abdullah, Ph. D	Pls. Aver. (ECF No. 9624) ¶ 503		<u>Pls. Ex. 165:</u> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lack of personal knowledge. <i>See</i> Fed. R. Evid. 602.
166	9624	Part Four of the Joint Congressional Inquiry Into Intelligence Community Activities Before and After the Terrorist Attacks of September 11, 2001 ("the 28 Pages")	Pls. Aver. (ECF No. 9624) ¶ 505		
167	9624	August 3, 2002 Letter from Al Rajhi Bank to SAMA re: Bayoumi Transactions	Pls. Aver. (ECF No. 9624) ¶ 476	ARB 39329	
168	9624	Payments made to Bayoumi's Bank of America Account	Pls. Aver. (ECF No. 9624) ¶ 476	ARB 13761, 13762, 13767	

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169	9624	November 11, 2002 Letter from SAMA re Payments made to Bayoumi's Bank of America Account	Pls. Aver. (ECF No. 9624) ¶ 476	ARB 13754-13755	
170	9624 10153-1	August 3, 2006 IIRO Branch Designation, marked as Abdullah al Rajhi Exhibit 28	Pls. Aver. (ECF No. 9624) ¶¶ 73, 117, 240, 242, 246 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 60		<u>Pls. Ex. 170:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for describing charity branch that has no connection to Al Rajhi Bank and for discussing designations of other terrorist groups and other attacks not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
171	9624 10153-1	January 11, 2024 Transcript of the Deposition of Evan F. Kohlmann	Pls. Aver. (ECF No. 9624) ¶¶ 290, 562 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 4, 5, 7, 44, 47, 48, 9, 50, 56, 59, 60, 61, 68, 74, 80, 86, 118		<u>Pls. Ex. 171:</u> - Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay (<i>see</i> Fed. R. Evid. 802) and to the extent expert is not qualified to offer opinion on sanctions designations or banking regulations. <i>See</i> Fed. R. Evid. 702.

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172	9624	Internal Al Rajhi Bank Communications re Al-Haramain Personal and Joint Personal Accounts, Oct. 8, 1998	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38920	
173	9624	Internal Al Rajhi Bank Communications re Al-Haramain Personal and Joint Personal Accounts, Sept. 1, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38885	
174	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Sept. 9, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38878	
175	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Oct. 13, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38994	
176	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Nov. 4, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38995	
177	9624	Internal Al Rajhi Bank Communications re Al-Haramain Personal and Joint Personal Accounts, Nov. 13, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 39001	.

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
178	9624	Internal Al Rajhi Bank Communications re Al-Haramain Personal and Joint Personal Accounts, Nov. 16, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38996	
179	9624	Internal Al Rajhi Bank Communications re Al-Haramain Personal and Joint Personal Accounts, Nov. 23, 1999	Pls. Aver. (ECF No. 9624) ¶¶ 328, 331, 332	ARB 38978	
180	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Jan. 19, 2000	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38979	
181	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Sept. 10, 2000	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 39077	
182	9624	AHIF Communications with ARB re Personal and Joint Personal Accounts, Aug. 8, 2001	Pls. Aver. (ECF No. 9624) ¶¶ 328, 332	ARB 38486	
183	9624	March 7, 2024 Declaration of Ben T. Railsback	Pls. Aver. (ECF No. 9624) ¶¶ 359, 360		Pls. Ex. 183: - This Declaration should be excluded for the reasons stated in

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					Al Rajhi Bank's Motion to Strike. <i>See</i> ECF No. 9772.
184	9624	February 9, 2024 Transcript of the Deposition of Fawzi al Hobayb	Pls. Aver. (ECF No. 9624) ¶¶ 362		
185	9624 10153-1	Check payable to WAMY	Pls. Aver. (ECF No. 9624) ¶¶ 419, 560 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 6, 67	NL 10068, 10384	<u>Pls. Ex. 185:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
186	9624 10153-1	Check payable to WAMY	Pls. Aver. (ECF No. 9624) ¶¶ 419, 560 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 6, 67	NL 10333	<u>Pls. Ex. 186:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
187	9624 10153-2	Statements of Account for Soliman Al Bathi	Pls. Aver. (ECF No. 9624) ¶¶ 337, 367, 377 Pls. Ex. B (ECF 10153-2) Resp. to ¶ 567	ARB 858-959	
188	9624 10153-1	ARB Branch Manual, 1997	Pls. Aver. (ECF No. 9624) ¶¶ 303, 304	ARB 16-734	

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			Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 45, 57, 69, 75, 81, 87		
189	9624 10153-1	ARB AML Guide, Nov. 1998	Pls. Aver. (ECF No. 9624) ¶¶ 303, 304, 305, 362, 363, 372, 385 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 26, 27,	ARB 735-744	
190	9624	Associated Press article by Richard Cole, May 26, 1997	Pls. Aver. (ECF No. 9624) ¶¶ 291, 292		<u>Pls. Ex. 190:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
191	9624	Galloway Exhibit 3 – IIRO Accounts at ARB	None		<u>Pls. Ex. 191:</u> - Improper summary exhibit. <i>See</i> Fed. R. Evid. 1006.
192	9624	U.N. General Assembly Resolution, January 1997	Pls. Aver. (ECF No. 9624) ¶ 286		<u>Pls. Ex. 192:</u> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
193	9624	U.N. International Convention for the Suppression of the Financing of Terrorism, United Nations 1999	Pls. Aver. (ECF No. 9624) ¶ 288		

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194	9624	Abdullah al Rajhi Exhibit 51 – Payments from bin Abdulaziz Al Rajhi Charity to AHIF	Pls. Aver. (ECF No. 9624) ¶¶ 545, 546	ARB 39960	
195	9624	Abdullah al Rajhi Exhibit 52 – Payments from bin Abdulaziz Al Rajhi Charity to AHIF	Pls. Aver. (ECF No. 9624) ¶ 545	ARB 39961	
196	9624	Abdullah al Rajhi Exhibit 55 – Checks to AHIF and correspondence with Aqil	Pls. Aver. (ECF No. 9624) ¶¶ 545, 546	NL 10086, 1088, 10094, 10245	<p><u>Pls. Ex. 196:</u></p> <ul style="list-style-type: none"> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association with individuals. <i>See</i> Fed. R. Evid. 403.
197	9624	Abdullah al Rajhi Exhibit 54 – Aqil account statements	Pls. Aver. (ECF No. 9624) ¶¶ 546	ARB 41464-41501	
198	9624	Two-Year Report for Non-Profit Foreign and Domestic Corporations for Sana-Bell	Pls. Aver. (ECF No. 9624) ¶¶ 548, 556	SANA-BELL 37-38	<p><u>Pls. Ex. 198:</u></p> <ul style="list-style-type: none"> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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199	9624	Galloway Exhibit 24 – Sulaiman bin Abdulaziz Al Rajhi letters resigning from IIRO	Pls. Aver. (ECF No. 9624) ¶¶ 548, 549, 550, 551	ARB 39596-39597	
200	9624	May 30, 1995 letter from the Assistant Director of IIRO-Tanzania Office to the Chief of Protocol, Ministry of Foreign Affairs, Dar es Salaam	Pls. Aver. (ECF No. 9624) ¶ 553	IIRO 315040	<p><u>Pls. Ex. 200:</u></p> <ul style="list-style-type: none"> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for discussing charity work that has no link to Al Qaeda. <i>See</i> Fed. R. Evid. 403.
201	9624	Complaint in <i>USA v. Sohail Omar Kabir</i>	Pls. Aver. (ECF No. 9624) ¶ 570		<p><u>Pls. Ex. 201:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice for imputing liability by guilt-by-association through connections with individuals. <i>See</i> Fed. R. Evid. 403.

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
202	9624	Statement purportedly by Abdullah al Jibrin, October 26, 1999	Pls. Aver. (ECF No. 9624) ¶ 573		Pls. Ex. 202: - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
203	9624	Payments of checks to "Abdullah bin Ibrahim al Misfer"	Pls. Aver. (ECF No. 9624) ¶ 263	NL 10327, 10348, 10349, 10350, 10145, 10423, and 10194	Pls. Ex. 203: - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
204	9624	FBI Protected Materials version of Jonathan Winer's Expert Report	Pls. Aver. (ECF No. 9624) ¶ 479		Pls. Ex. 204: - <i>See</i> Objections to Pls. Ex. 4.
205	9624	AT&T Subpoena Response	Pls. Aver. (ECF No. 9624) ¶ 479		Pls. Ex. 205: - Should be excluded under Rule 403 for unfair prejudice for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
206	9624	Purported "telephone directory"	Pls. Aver. (ECF No. 9624) ¶ 479	NL 18775	Pls. Ex. 206: - Lacks authentication. <i>See</i> Fed. R. Evid. 901.
207	9624	Telephone records for Fahad al Thumairy	Pls. Aver. (ECF No. 9624) ¶ 479	FBI 573-580	Pls. Ex. 207: - Lacks authentication. <i>See</i> Fed. R. Evid. 901.

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					- Should be excluded under Rule 403 for unfair prejudice for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
208	9624	FBI Protected Materials version of Evan Kohlmann's Expert Report	Pls. Aver. (ECF No. 9624) ¶¶ 479, 490		<u>Pls. Ex. 208:</u> - <i>See</i> Objections to Pls. Ex. 38.
209	9624 10153-1	FBI Memorandum, Sept. 27, 2001 (FBI Protected Material)	Pls. Aver. (ECF No. 9624) ¶¶ 490, 498 Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 145	EO14040-002857-2863-MDL	<u>Pls. Ex. 209:</u> - <i>See</i> Objections to Pls. Ex. 160.
Ex. F	10153-1	May 3, 2024 letter from Assistant U.S. Attorneys Sarah S. Normand and Jennifer Jude	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 2, 41, 108, 119, 120, 143, 144, 145, 146		<u>Pls. Ex. F:</u> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. Plaintiffs asserted that the FBI "will be providing Plaintiffs with a declaration attesting to the facts" in this letter." Plaintiffs have not submitted such a letter. <i>See</i> Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 2 n. 2. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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Ex. I	10153-1	New York State Dept. of Financial Services Press Release, <i>DFS Fines Habib Bank and its New York Branch \$225 Million for Failure to Comply with Laws and Regulations Designed to Combat Money Laundering, Terrorist Financing, and Other Illicit Financial Transactions</i> , September 7, 2017.	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 11		<p><u>Pls. Ex. I:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for (i) offering evidence of findings concerning the financial controls of <i>another bank</i> in October 2014 – March 2015 and (ii) offering evidence of correspondent-banking transactions of Al Rajhi Bank from 2014-17, more than ten years after the relevant period. <i>See</i> Fed. R. Evid. 403.
Ex. J	10153-1	Juan C. Zarate, Treasury's Wars: The Unleashing of a New Era of Financial Warfare (2013)	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 50		<p><u>Pls. Ex. J:</u></p> <ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association. <i>See</i> Fed. R. Evid. 403.
Ex. K	10153-4	Declaration of Mary C. Williams, Central	Pls. Ex. D (ECF No. 10153-4) at 2 n.1 and Resp. to Pls. Ex. 9		<u>Pls. Ex. K:</u>

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		Intelligence Agency, (July 18, 2024)			Does not establish admissibility of referenced materials because it: - Fails to authenticate or establish a business records exception (under Rule 803(6)) to the hearsay rule for the CIA reports listed therein: <i>first</i> , Williams is not a proper custodian (Fed. R. Evid. 902(11)); and, <i>second</i> , she cannot certify that the documents were made at or near the time by or with information from someone with knowledge (Fed. R. Evid. 803(6)(A), incorporated by reference into Fed. R. Evid. 902(11)).
Ex. L	10153-4	Declaration of Mary C. Williams, Central Intelligence Agency, (April 19, 2024)	Pls. Ex. D (ECF No. 10153-4) at 2 n.1 and Resp. to Pls. Ex. 9		<u>Pls. Ex. L:</u> Does not establish admissibility of referenced materials because it: - Fails to authenticate or establish a business records exception (under Rule 803(6)) to the hearsay rule for the CIA reports listed therein: <i>first</i> , Williams is not a proper custodian (Fed. R. Evid. 902(11)); and, <i>second</i> , she cannot certify that the documents were made at or near the

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					time by or with information from someone with knowledge (Fed. R. Evid. 803(6)(A), incorporated by reference into Fed. R. Evid. 902(11)).
Ex. M	10153-4	Declaration of Deborah Crum, Federal Bureau of Investigation (March 21, 2024)	Pls. Ex. D (ECF No. 10153-4) at 2 n.1 and Resp. to Pls. Ex. 9		<p><u>Pls. Ex. M:</u></p> <ul style="list-style-type: none"> - Does not authenticate any exhibits introduced by Plaintiffs, because it purports to authenticate (1) documents based on bates numbers that have never been produced to Al Rajhi Bank and that are not cited by Plaintiffs here, and (2) documents based on exhibit numbers that do not match any exhibits cited by Plaintiffs here. - Should be excluded under Rule 403 for confusing the issues. <i>See</i> Fed. R. Evid. 403. This declaration appears to relate to a different litigation.
Ex. N		Declaration of Miad Maleki, U.S. Department of Treasury (September 16, 2024)	Plaintiffs filed this declaration on the eve of Al Rajhi Bank's Reply submission, 67 days after their Opposition materials,		<p><u>Pls. Ex. N:</u></p> <p>Does not establish admissibility of referenced materials because it:</p>

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			and it is not relied upon in their Opposition materials. <i>See</i> Pls. Ex. D (ECF No. 10153-4) at 2 n.1		- Fails to authenticate or establish a business records exception (under Rule 803(6)) to the hearsay rule for the Treasury documents listed therein: <i>first</i> , Maleki is not a proper custodian (Fed. R. Evid. 902(11)); and, <i>second</i> , he cannot certify that the documents were made at or near the time by or with information from someone with knowledge (Fed. R. Evid. 803(6)(A), incorporated by reference into Fed. R. Evid. 902(11)).
Ex. O		Declaration of Lawrence D. Buckley, Jr., Federal Bureau of Investigation (July 29, 2024)	Plaintiffs filed this declaration on the eve of Al Rajhi Bank's Reply submission, 67 days after their Opposition materials, and it is not relied upon in their Opposition materials. <i>See</i> Pls. Ex. D (ECF No. 10153-4) at 2 n.1		<u>Pls. Ex. O:</u> Does not establish admissibility of referenced materials because it: - Fails to authenticate or establish a business records exception (under Rule 803(6)) to the hearsay rule for the FBI documents listed therein: <i>first</i> , Buckley is not a proper custodian (Fed. R. Evid. 902(11)); and, <i>second</i> , he cannot certify that the documents were made at or near the time by or with information from someone with knowledge (Fed. R. Evid. 803(6)(A),

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					incorporated by reference into Fed. R. Evid. 902(11)).
N/A	10153-1	"CDLR Monitor, 1995"	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 44, 47		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice, confusing the issues, and misleading. <i>See</i> Fed. R. Evid. 403. This article does not lend support for Plaintiffs' contention that it was "widely known throughout the Kingdom that Al Haramain supported armed conflict."</p>
N/A	10153-1	IPS-Inter Press Service, Kenya: <i>Gov't Shuts Down Five Islamic Relief Agencies</i> , September 10, 1998	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 51, 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch offices of Al Haramain and IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.</p>

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N/A	10153-1	The U.N. Refugee Agency, <i>Human Rights Watch World Report 1999 – Kenya</i> , January 1, 1999	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 51, 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch offices of Al Haramain and IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	Associated Press, <i>Kenya Bans Six Islamic Aid Agencies After U.S. Bombing</i> , September 9, 1998	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 51		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch office of Al Haramain that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	University of Pennsylvania-African Studies Center, <i>Horn of Africa: The Monthly Review</i> , 19-10/98	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 51, 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p>

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					- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch offices of Al Haramain and IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	New York Times, <i>Some Charities Suspected of Terrorist Role</i> , February 19, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 51, 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charities generally, with no mention of Al Haramain or IIRO. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	The Indian Ocean Newsletter, <i>Banned Islamic NGOs</i> , September 12, 1998	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 51, 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch offices of Al Haramain and</p>

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					IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Daily News, <i>It's More than Just Who Plants the Explosives</i> , July 31, 1996	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	The Age, <i>Filipino Muslims Linked to Holy Warrior's Global Terror</i> , May 20, 1995	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Frontline, <i>A Terrorist Plot Unearthed</i> , March 12, 1999	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent

EX. NO.	ECF NO.	DESCRIPTION	PARAGRAPH(S) OF PLAINTIFFS' MATERIALS CITING EVIDENCE TO WHICH AL RAJHI BANK OBJECTS	BATES NO.	OBJECTION(S) (TO PORTIONS REFERENCED BY PLAINTIFFS)
					<p>Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	ITAR-TASS, <i>Russian Troops Find Arab, Bosnian Passports in Chechnya</i> , February 21, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks and theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	Japan Economic Newswire, <i>Bin Laden Providing Money, Military Aid to MILF: Report</i> , February 13, 1999	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 63, 76		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing</p>

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					charity organizations and theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Philippine Daily Inquirer, <i>Front Page: Bin Laden Funds Abu Sayyaf Through Muslim Relief Group</i> , August 9, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 63, 76		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing branch office of IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	Philippine Daily Inquirer, <i>Front Page: Gemma Linked to Bin Laden Group Funding Sayyaf, MILF</i> , August 10, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 63, 76		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	The Times, <i>Terror by Degree</i> , October 18, 1997	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent

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					<p>Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charities generally, with no mention of Al Haramain or IIRO. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	U.S. News & World Report, <i>A Helping Hand From Saudi Arabia</i> , July 8, 1996	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing charity organizations and theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	The Straits Times, <i>Osama Gave Funds to Abu Sayyaf: Manila</i> , August 10, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶¶ 63, 76		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing</p>

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					branch office of IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Overseas Immigration News, <i>Immigration Claims Teacher Linked to Terrorists Alleged Al-Jihad Member: Egyptian Denies Allegations, is Appealing Legal Proceedings</i> , May 21, 1999	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 63		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing individual unrelated to this litigation and branch office of IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	The New York Times, <i>Muslims From Afar Joining "Holy War" in Bosnia</i> , December 5, 1992	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theater not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.

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N/A	10153-1	Muslim World News, <i>WAMY Calls for Jihad to Free Kashmir</i> , June 3, 1991	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theater not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Riyadh Daily, <i>Kashmiri Leader Thanks WAMY for Help</i> , December 8, 1995	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theater not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-1	Al Jazeera, <i>The Chechen Tragedy</i> , January 15, 2000	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and

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					confusing the issues for discussing theater not at issue in this litigation. <i>See Fed. R. Evid. 403.</i>
N/A	10153-1	MWL Journal of August-September 1993	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See Fed. R. Evid. 802.</i> Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See Fed. R. Evid. 403.</i></p>
N/A	10153-1	MWL Journal of January 1994	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See Fed. R. Evid. 802.</i> Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See Fed. R. Evid. 403.</i></p>
N/A	10153-1	MWL Journal of September 1995	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		- Hearsay to which no exception applies. <i>See Fed. R. Evid. 802.</i> Should be excluded to the extent

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					<p>Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	MWL Journal of February-March 1990	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	MWL Journal of September-October 1990	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>

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N/A	10153-1	MWL Journal of January-February 1991	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	MWL Journal of September 1998	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 70		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing theaters not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.</p>
N/A	10153-1	Gulf News, <i>Orphanages in Southern Philippines Under Probe</i> , October 2, 2001	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 76		<p>- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay.</p> <p>- Should be excluded under Rule 403 for unfair prejudice and</p>

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					confusing the issues for discussing branch office of IIRO that had no account at Al Rajhi Bank. <i>See</i> Fed. R. Evid. 403. Furthermore, Plaintiffs erroneously say this article was published February 10, 2001, but it was published October 2, 2001, after the 9/11 attacks.
N/A	631-2	Declaration of Dr. Abdulrahman A. Al-Suwailem	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 79		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802
N/A	10153-1	BBC News, <i>U.S. Fears Terrorist Attacks in Kosovo</i> , April 3, 2002	Pls. Ex. A (ECF No. 10153-1) Resp. to ¶ 82		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. Should be excluded to the extent Plaintiffs use experts as a conduit for inadmissible hearsay. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks, theaters, and charity organizations not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Los Angeles Times, <i>Young Saudis Eager to Battle Americans</i> , April 5, 2003	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 265		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting

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					to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Shia News Association, <i>For 4 More Years, Top Dissident Cleric's Prison Sentence Extended by Saudi Arabia</i> , August 8, 2019	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 265		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association and discuss individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Washington Post, <i>U.S. Revokes Visa of Cleric at Saudi Embassy; Monarchy to No Longer Be Islamic Institute's Sponsor</i> , December 2003	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 481		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Lecture Series Video, "The Quran's Rational Arguments," Dr. Jafar Idris and Yassir Farzaga	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 481		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting

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					to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	The Lado Group, <i>Islamic Scholarship in America</i> , Nicole Ballivan, July 2, 2000	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 481		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Check and Correspondence regarding "Islamic Endowment Organization"	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 503	NL 0010244	<ul style="list-style-type: none"> - Lacks authentication. <i>See</i> Fed. R. Evid. 901. - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks, theaters, and charity organizations not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	New York Times, <i>How Kosovo Was Turned into</i>	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 503		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.

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		<i>Fertile Ground for ISIS</i> , May 21, 2016.			- Should be excluded under Rule 403 for unfair prejudice and confusing the issues for discussing attacks, theaters, and charity organizations not at issue in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	"The Suleiman al-Rajhi Charitable Committee" https://www.rf.org.sa/en	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 546		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
N/A	10153-2	Arab News, <i>RCCI Forum Pushes for Reviving Endowments</i> , May 7, 2012	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 546		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802.
N/A	10153-2	Government's Memorandum in Support of Pretrial Detention, <i>U.S. v. Sedaghtay</i> (Aug. 21, 2007) (No. 05-CR-60008-01).	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶¶ 567, n.3, n.5		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	Transcript of Proceedings, <i>U.S. v. Sedaghtay</i> (Sept. 19, 2007) (No. 05-CR-60008)	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶¶ 503, n.2, n.4		- Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and

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					confusing the issues for attempting to impute liability through guilt-by-association and discussing individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.
N/A	10153-2	"Sheikh Abdullah Al-Jibrin Charitable Foundation," <i>Sheikh's Biography</i> , https://ibn-jebreen.com/biography	Pls. Ex. B (ECF No. 10153-2) Resp. to ¶ 572		<ul style="list-style-type: none"> - Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. - Should be excluded under Rule 403 for unfair prejudice and confusing the issues for attempting to impute guilt-by-association and discuss individuals not involved in this litigation. <i>See</i> Fed. R. Evid. 403.